

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----X	
	:
RONALD CANTOR, IVAN SNYDER and	:
JAMES A. SCARPONE, as TRUSTEES OF	:
THE MAFCO LITIGATION TRUST,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
RONALD O. PERELMAN,	:
MAFCO HOLDINGS INC.,	:
MacANDREWS & FORBES HOLDINGS INC.,	:
ANDREWS GROUP INCORPORATED,	:
WILLIAM C. BEVINS and	:
DONALD G. DRAPKIN,	:
	:
Defendants.	:
	:
-----X	

No. 97-CIV-586-KAJ

**DECLARATION OF
EMILY A. STUBBS IN
SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL THE
PRODUCTION OF
DOCUMENTS**

Emily A. Stubbs declares:

1. I am an associate with Friedman Kaplan Seiler & Adelman LLP, attorneys for plaintiffs in this action, and have been admitted to this Court *pro hac vice*. I submit this declaration in support of plaintiffs' motion to compel the production of certain documents withheld by defendants upon a claim of privilege.

2. Attached as Exhibit 1 is a copy of the Fourth Amended Joint Plan of Reorganization in *In re Marvel Entertainment Group, Inc., et al.*, Case No. 97-638 (D. Del.).

3. Attached as Exhibit 2 is a copy of the Consent Order (1) Approving Stipulation And Agreement Effecting Consensual Amendment To Third Amended Joint Plan of Reorganization Proposed By The Secured Lenders And Toy Biz,

Inc, (2) Confirming Fourth Amended Joint Plan of Reorganization Proposed By The Secured Lenders And Toy Biz, Inc. and (3) Establishing Bar For Fee Applications And Administration Expense Claims, in *In re Marvel Entertainment Group, Inc., et al.*, Case No. 97-638 (D. Del.), signed by Judge McKelvie on July 31, 1998.

4. Attached as Exhibit 3 is a copy of the MAFCO Litigation Trust Agreement dated as of October 1, 1998.

5. Attached as Exhibit 4 is a copy of a letter from Anthony W. Clark dated March 8, 2002 together with a copy of defendants' privilege log and supplemental privilege log.

6. Attached as Exhibit 5 is a copy of the Court's order dated July 30, 2002 (D.I. 348).

7. Attached as Exhibit 6 is a copy of a letter from Paul Lockwood dated May 23, 2002.

8. Attached as Exhibit 7 is a copy of a letter from Thomas J. Allingham II dated Nov. 7, 2005 (D.I. 438).

9. Attached as Exhibit 8 is a copy of a letter from Emily A. Stubbs to David Fleischer dated October 19, 2005, and a copy of a letter from David Fleischer to Emily A. Stubbs dated October 19, 2005.

10. Attached as Exhibit 9 is a copy of a letter, without exhibits, from Edward A. Friedman to Magistrate Judge Mary Pat Thyng dated June 7, 2002 (D.I. 319).

11. Attached as Exhibit 10 is a copy of a letter, without exhibits, from Anthony W. Clark to Magistrate Judge Mary Pat Thyng dated June 12, 2002 (D.I. 322).

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 22, 2005 at New York, New York.



Emily A. Stubbs